

TCEQ HRVOC Stakeholder Group
Fugitive Emissions Audit Provisions
Tuesday October 23, 2007, 1:30 - 3:30 P.M.
Houston-Galveston Area Council

Summary of items discussed at the meeting.

Stakeholders asked if pressure relief valves were subject to the audit provisions in §115.788.

- Upon further review TCEQ staff determined that for the purposes of the HRVOC audit provisions valves and pressure relief valves are treated separately and therefore pressure relief valves are not subject to the third-party audit provisions.

Stakeholders asked the TCEQ to clarify when the third-party audits are considered “complete” for the purposes of complying with the portion of §115.788(d) that requires audit reports to be submitted within 30 days after the completion of the third-party audit requirements.

- Section 115.788 states that the audit reports must be submitted within 30 days after the completion of the audit requirements in §115.788(a).

Stakeholders commented that due to federal requirements some sites use a monthly monitoring schedule in addition to the usual quarterly monitoring schedule for leak detection. The stakeholder asked if the monthly or quarterly data should be used to determine the minimum number of valves to monitor during the third-party audit.

- Section 115.788(a)(2)(B) states that the average of the previous four quarters' monitoring results should be used to determine the minimum number of valves to monitor during the third-party audit. Staff also indicated that averaging the monitoring results for the three months within a quarter would be acceptable for determining the results for that quarter.

Stakeholders asked the TCEQ to clarify what criteria would require an affected site to submit a corrective action plan along with their annual audit report.

- Section 115.788(e) states that a corrective action plan must be submitted if the third-party audit indicates deficiencies in the implementation of Test Method 21.

Stakeholders asked the TCEQ to clarify what records should be reviewed to comply with §115.788(d)(5) requiring the third-party auditor to review the calibration records from the previous quarter.

- Section 115.788(a)(3)(B) states that the third-party should review the applicable previous quarter's calibration records to verify that the calibration requirements of Test Method 21 have been properly implemented.

Stakeholders asked if EPA had indicated any specific criteria for the rule effectiveness study or the review of the third-party audit reports.

- EPA did not request specific criteria or parameters to include in the study but suggested reviewing the third-party audit reports. In response to EPA's comment, TCEQ agreed to conduct a rule effectiveness study. Staff indicated that two years of data may not be sufficient for an effective review of the third-party audit program and a couple more years of audit reports may be necessary to provide sufficient data.

Stakeholders suggested the TCEQ publish a template document for the third-party audit report.

- TCEQ staff said this issue would be discussed with management.